

Before the  
**COPYRIGHT ROYALTY JUDGES**  
Library of Congress  
Washington, D.C.

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**In the Matter of**

**Distribution of the 2014 - 2017  
Satellite Royalty Funds**

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) **CONSOLIDATED**  
) **Docket No. 16-CRB-0010-SD**  
) **(2014-17)**  
)  
)

**COMMENTS OF THE  
BROADCASTER CLAIMANTS GROUP  
ON CONTROVERSIES REGARDING DISTRIBUTION OF 2014 - 2017  
SATELLITE FUNDS**

The Broadcaster Claimants Group (“BCG”), by its counsel, files these comments in the above-referenced proceeding in response to the Notice issued by the Copyright Royalty Judges, 83 Fed. Reg. 56106 (Nov. 9, 2018). The Notice requests comments on the existence and extent of any controversies regarding the distribution of 2014 – 2017 satellite funds.

**A. Existence of Allocation Phase Controversies**

With respect to the 2014, 2015, 2016, and 2017 satellite funds, allocation controversies exist at the present time among Broadcaster Claimants Group, Program Suppliers, Joint Sports Claimants, Music Claimants, and Devotional Claimants.

**B. Existence of Distribution Phase Controversies**

With respect to the 2014, 2015, 2016, and 2017 satellite funds, BCG is aware of the existence of distribution controversies between commercial television station claimants and other claimants as to the Program Suppliers and Devotional royalties.

BCG reserves its right to identify additional controversies in response to the acquisition of additional information, or the filings of additional parties.

Respectfully submitted,

BROADCASTER CLAIMANTS GROUP

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